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ABBOTT LABORATORIES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SMITHKLINE BEECHAM CORPORATION,)
d/b/a GLAXOSMITHKLINE,)
Plaintiff,)
vs.)
ABBOTT LABORATORIES,)
Defendant.)

Case No. C 07-5702 CW

*Related Per November 19, 2007 Order to
Case No. C 04-1511 CW*

**DECLARATION OF NICOLE M. NORRIS
IN SUPPORT OF FILING ABBOTT
LABORATORIES' REDACTED REPLY
BRIEF RE ITS MOTION TO DISMISS
PLAINTIFFS' COMPLAINT PURSUANT
TO RULE 12(B)(6)**

1 I, Nicole M. Norris, declare:

2 1. I am an attorney at law, admitted to practice in this Court for these matters. I
3 am an associate with the law firm of Winston & Strawn LLP, counsel of record for Abbott
4 Laboratories ("Abbott"), and am authorized to make this Declaration in that capacity.

5 2. I submit this declaration in support of filing a redacted version of Abbott's
6 Reply Brief regarding its Motions to Dismiss the GSK Complaint Pursuant to Rule 12(b)(6)
7 ("Reply"). The statements contained herein are based on my own personal knowledge unless
8 otherwise stated.

9 3. Abbott's Reply cites relevant portions of the Highly Confidential Exhibit 1
10 ("Exhibit") cited in Abbott's Opening Motion to Dismiss the GSK Complaint Pursuant to Rule
11 12(b)(6). The Exhibit cited is a License Agreement between Abbott and GSK for the HIV/AIDS
12 drug Norvir®.

13 4. The parties previously stipulated that this Exhibit is Highly Confidential and
14 should be filed under seal. This court agreed, and granted Abbott's motion to file the Exhibit under
15 seal.

16 5. Abbott does not object to the public disclosure of the cited portions of the
17 Exhibit in Abbott's Reply. However, given its Highly Confidential/Sealed status, out of an
18 abundance of caution, Abbott elected to temporarily file the Reply under seal giving GSK the option
19 to seek to have the Reply permanently sealed.

20 6. If GSK decides it will not pursue a permanent seal of Abbott's Reply, Abbott
21 will re-file an un-redacted version of its Reply in the public domain.

22 I declare under penalty of perjury under the laws of the United States of America that
23 the foregoing is true and correct.

24 Executed in San Francisco, California, this 21st day of February, 2008.

25 /s/ Nicole M. Norris

26 Nicole M. Norris,
27 nnorris@winston.com
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